



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

January 7, 2012

Richard Hardt
RMP Team Leader
BLM Eugene District Office
P.O. Box 10226
Eugene, Oregon 97477

Re: EPA Region 10 Comments on the Bureau of Land Management Draft Resource Management Plan and Environmental Impact Statement for the West Eugene Planning Area (EPA Project Number 11-023-BLM).

Dear Mr. Hardt:

This review was conducted in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our Section 309 authority, our review of the DEIS considers the expected environmental impacts, and the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA.

The DEIS analyzes a no action alternative and six action alternatives designed to represent different management approaches for the West Eugene Planning Area. The stated objective of the planning effort is to contribute to the recovery of species listed under the Endangered Species Act, while providing other benefits, particularly maintaining the ecological function of wetlands; habitat for other plant and animal communities; and recreation and environmental education opportunities. The preferred alternative identified by BLM is Alternative 2A, which would manage 68 percent of the planning area as "natural maintenance area" and 32 percent of the planning area as "prairie restoration area." Under this alternative, herbicide would be included among the management tools.

In our June 30, 2011 scoping comments, the EPA emphasized the need to explore a range of management tools and options within the EIS. We also indicated support for Integrated Vegetation Management as an approach to dealing with invasive species. Finally, we encouraged the continued recognition of the Long Tom Area of Critical Environmental Concern.

The DEIS was fully responsive to the questions and issues raised in our scoping comments. The range of alternatives represents an appropriate spectrum of management approaches, and we are pleased to note that the preferred alternative retains the Long Tom area as an Area of Critical Environmental Concern.

With regard to the analysis of impacts related to invasive species management, we are pleased with the inclusion of the herbicide effects analysis in Appendix D, and the discussion in Chapter 4 related to herbicide use and potential affects to soils, water, plants and animals. In our scoping comments we recommended the inclusion of a decision key that could help managers and the public understand when,

and to what extent herbicides would be used. It was our view that such a decision key could prioritize available control tools (mechanical/hand removal, cultural controls, herbicides, etc.) and clearly define the basis for moving from one tool to the next. The relatively small size of the planning and the site specifics associated with each infestation may render such a tool unnecessary, but we continue to encourage the BLM to include additional information in the Final EIS about decision thresholds, and when managers should conclude that burning, manual, mechanical, and other non-chemical vegetation treatments are insufficient to control or restore and maintain high quality habitat for prairie-related species.

Overall, we support the preferred alternative, and the habitat connectivity achieved under that alternative on many of the contiguous parcels. We note, however, that the shift of ash swale/riparian habitat to wet prairie is minimal, as is the overall increase in oak savanna. As the final preferred alternative is refined in the Final EIS, we encourage the BLM to consider opportunities to restore additional wet prairie. In particular, we believe there would be ecological benefit to restoring the oak savanna and wet prairie areas within the North Taylor parcel. Restoration in this area would potentially benefit and support the ecological objectives served by the Long Tom Area of Critical Environmental Concern.

Because our review did not identify any environmental impacts that should be avoided in order to fully protect the environment, we have rated this EIS as Lack of Objections (LO). An explanation of this rating is enclosed. We appreciate the opportunity to participate early in the planning process for this project. If you have questions about our comments, please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Teresa Kubo of my staff at (503) 326-2859 or by electronic mail at kubo.teresa@epa.gov.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosure



**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.